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REMARKS

5 Reconsideration of the application is respectfully requested. The abstract was objected to. A revised abstract has been prepared that should be in full conformance. No new matter has been added.

10 Claims 1 and 5-10 were rejected under Section 102 as being anticipated by Bridges. This rejection is respectfully traversed. No new matter has been added to the claims.

15 To summarize the present invention, it is an effective method for dynamically updating the list of preferred networks in the mobile equipment. This is different from conventional dynamic roaming management that intrusively and actively attempts to move the mobile equipment from the non-preferred network to a preferred network. The present invention also ensures that the lists of preferred networks of roaming mobile equipment/phones are updated. Additionally, the method of the present invention, updates the list of preferred networks to include a new preferred network if it is not included in the list or changes the ranking of the networks should they be incorrectly ranked in the list when the mobile equipment roams into the new preferred network. When the list of preferred networks in the control file has been updated, the roaming management application can determine 20 whether the mobile equipment has roamed into a preferred network in accordance with the desired roaming behavior for the location at which the mobile equipment has roamed to. However, the method does not actively move or force the mobile equipment to use the new preferred network right away but 25 trusts that the mobile equipment is sufficiently smart to switch to the new preferred network the next time a network search is performed since the list of preferred networks is then updated to be in conformance with the desired roaming behavior.

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Bridges merely discloses a conventional roaming system that, basically, has now become standard in modern mobile telephones according to, for example, the widely used GSM standard. In Bridges system, a generator generates a list 5 of the preferred wireless carrier identities. The generated list is transmitted to each mobile station by a data-providing device (see for example the abstract and col. 5, lines 58-64).

In this way, each mobile station is kept updated as roaming airtime rates and other service characteristics of the 10 operators change. In col. 4, lines 18-48, Bridges explains that corporations may have national account subscribers so that the preferred wireless carrier may be selected based upon predetermined classes of service of the subscribers (col. 5, lines 18-52). All the mobile stations previously provided 15 with the list are updated. The mobile phone selects a preferred wireless carrier from the updated list when then mobile phone enters a roaming area (see col. 6, lines 35-50).

This means the mobile phones are provided with the updated 20 list whether the phone is roaming or not. The updating of the list is, among other things, based on changes of roaming agreements between operators (col. 4, lines 36-48) but not at all on the current location of the mobile phone. More particularly, it should be noted that Bridges teaches no 25 dynamic updating of the list wherein it is the current location of the mobile phone that is the trigger for the updating of the list to make sure the list is according to the desired roaming behavior for the location of the mobile phone.

In contrast, Bridges teaches updating the list as 30 decided by a central unit such as a centralized PSL/IRDB database, as explained in col. 19, lines 46-60. In other words, the updating is not directly based on the desired roaming behavior for the location. In contrast, Bridges updates the list of the mobile phone regardless whether the 35 mobile phone is roaming or not. As indicated earlier, the updating decision is rather based on the latest roaming

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agreement between the operators or when the mobile phone changes its class of service and other factor as listed in col. 15, lines 37-49.

This means the comparison between the current  
5 roaming setting and the desired roaming behavior for the particular is not started upon receipt of the roaming signal from the mobile phone. The updating of the lists is made regardless of the location of the mobile phone. Also, there  
10 is no dynamic comparison between the current roaming setting and the desired roaming behavior for the location where the mobile phone is currently located.

In summary, it is submitted that the cited references fail to teach or suggest the steps of:

15 1) upon receipt of the roaming information from the mobile equipment, the roaming management application comparing a current roaming setting of the mobile equipment with a desired roaming behavior for the location of the mobile equipment during roaming;  
20 2) the roaming management application determining whether the list of preferred networks in the control is updated in accordance with the desired roaming behavior for the location for the mobile equipment; and  
25 3) when the list is updated, the roaming application manager determining whether the mobile equipment roamed into a preferred network in accordance with the desired roaming behavior for the location for the mobile equipment.

Applicants fails to see why a person of ordinary skill in the art would look to Bridges and the other cited references to learn about the dynamic updating of the list of preferred networks as needed depending upon the location of the roaming mobile equipment when Bridges teaches that the list is only updated as decided by a central database and not based on the actual location of the mobile phone. In fact, Bridges updates the list in the mobile phones regardless of  
35 whether the mobile phone is roaming or not. Also, Bridges

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updates the list in the mobile phones based on factors that are substantially different from the desired roaming behavior of the actual location of the mobile phone. In contrast, Bridges updates large amounts of mobile phones from a central 5 database so that the list in each phone conforms to the latest roaming agreement etc. It is submitted it would be impractical or almost impossible to modify Bridges to dynamically update each mobile phone according to the location of all the mobile phones since the mobile phones are most 10 likely in different locations so it would be very difficult to correctly rank the preferred wireless carriers in the latest version of the generic list that is sent to all the mobile phones.

It is submitted Bridges would require extensive 15 modification that is not taught or suggested in the cited references, to meet all the limitations of the amended claim 1.

In view thereof, it is submitted that the amended 20 claim 1 is allowable.

Claims 5-9 are submitted to be allowable because they depend upon the allowable base claim 1 and because each 25 claim includes limitations that are not taught or suggested in the cited references.

Claim 10 is submitted to be allowable for reasons 30 that are similar to the reasons put forth for the allowability of the amended claim 1. The amended claim 10 includes no new matter. For example, the dynamic use of the lists is discussed on page 8, line 30. The dynamic roaming management is also discussed on page 5, lines 20-30. The comparison between the current roaming setting and the desired roaming behavior for the location that the mobile equipment roamed into is supported by, for example, the abstract.

Claims 2-4 were rejected under Section 103 as being 35 obvious over Bridges in view of Bamburak. This rejection is respectfully traversed.

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Claims 2-4 are submitted to be allowable because they depend upon the allowable base claim 1 and because each claim includes limitations that are not taught or suggested in the cited references.

5 The application is submitted to be in condition for allowance, and such action is respectfully requested.

Respectfully submitted,

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